



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

14 The United States Attorney charges:

15 | Count One

16 1. Between in or about the middle of 2003 through in or about
17 January 2004, Defendant NAVIN NITH was a member of the Tran
18 Organization, a criminal enterprise, based in the Southern District
19 of California and elsewhere, whose members and associates engaged in
20 criminal activities involving theft of large amounts of money from
21 casinos and gaming establishments through a card-cheating scheme;

22 2. Between in or about the middle of 2003 through in or about
23 January 2004, Defendant NAVIN NITH did knowingly, willfully, and
24 unlawfully conspire, confederate and agree with other persons known
25 and unknown, including other members of the Tran
26 Organization, to commit the following crimes against the United
27 States:

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1 A. To abstract, purloin, and willfully misapply, and take
2 and carry away with intent to steal, money, funds, assets and other
3 property of a value in excess of one thousand dollars (\$1,000)
4 belonging to a gaming establishment operated by and for, and licensed
5 by an Indian Tribe pursuant to an ordinance and resolution approved
6 by the National Indian Gaming Commission; in violation of Title 18,
7 United States Code, Section 1167(b);

8 B. To travel and cause travel in interstate and foreign
9 commerce, and use a facility in interstate and foreign commerce, with
10 intent to promote, manage, establish, carry on, and facilitate the
11 promotion, management, establishment, and carrying on, of unlawful
12 activity, to wit: a business enterprise involving gambling, and
13 bribery, in violation of the laws of the State of Washington, and
14 thereafter perform and attempt to perform said unlawful activity, in
15 violation of Title 18, United States Code, Section 1952;

16 C. To transport, transmit, and transfer in interstate and
17 foreign commerce goods, wares, merchandise, securities, and money of
18 the value of \$5,000 and more, knowing the same to have been stolen,
19 converted, and taken by fraud, in violation of Title 18, United States
20 Code, Section 2314;

21 D. To receive, possess, conceal, store, barter, sell, and
22 dispose of goods, wares, and merchandise, securities, and money, of
23 the value of \$5,000 and more, which crossed a State and United States
24 boundary after being stolen, unlawfully converted, and taken, knowing
25 the same to have been stolen, unlawfully converted, and taken, in
26 violation of Title 18, United States Code, Sections 2315; and

27 3. One of the members of the Tran Organization performed at
28 least one overt act for the purpose of carrying out the conspiracy.

1 All in violation of Title 18, United States Code, Sections 371
2 and 2.

3 Date: 9/3/08

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United States Attorney

6 ROBERT S. TULLY
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7 Southern District of California U.S. Attorney's Office
Trial Attorney, U.S. Department of Justice

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28 Criminal Case No. _____